

From: Marsh, Karen

Sent: Thursday, December 20, 2018 03:04 PM

To: Mia, Marcia

CC: Hambrick, Amy; Witt, Jon; Witosky, Matthew; Branning, Amy; Mills, Derek

Subject: RE: 0000a Reports

Attachments: 0000a Reports Evaluation.xlsx

Here's a basic template we could probably use and build from for an evaluation of the information. Let me know what revisions additional thoughts you have.

Karen

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

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Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Mia, Marcia

Sent: Wednesday, December 19, 2018 4:43 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>

Subject: RE: 0000a Reports

Ok, thanks for following up.

I am trying to get some contract dollars to do the review for us. I can also get a Drilling Info query done to connect the well IDs. I should know more about the contract \$\$ next week.

Marcia B Mia

Air Branch

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U.S. Environmental Protection Agency

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From: Marsh, Karen

Sent: Tuesday, December 18, 2018 10:05 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>

Subject: RE: OOOOa Reports

Marcia,

I spoke with Peter at EDF on Friday regarding the low production well data they thought would be available in the compliance reports. He wasn't sure off hand that information is available in the reports to conduct the analysis they suggest in their extension request letter. However, he said if it was there, it may be in the initial compliance reports. He said they would try to provide specifics in their comment letter so once I track that down, I can send it around.

Thanks!

Karen

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From: Marsh, Karen

Sent: Friday, December 07, 2018 9:27 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>

Subject: 0000a Reports

Marcia,

As I mentioned on the phone yesterday, I took a look at the EDF letter in greater detail and the assertions they were making. I also looked closer at the current CEDRI template (what people have been using if reporting to CEDRI) to see if there is information that could be used to evaluate their claims. Below is my assessment.

EDF implies that the 0000a compliance reports "contain information critical to assessing the feasibility and cost-effectiveness of the NSPS and any purported need to relax the standards."

Average Survey Time:

One area they highlight is the average survey times, stating the information "suggests fugitive monitoring costs are lower than estimated in the analysis for the NSPS." They go on to state that EPA assumes 14 hours annually per site for semiannual inspection and repair, or an average of 3.5 hours per well per survey, based on the assumption of 2 wells per site. I'm not sure how they came up with these numbers.

Ex. 5 Deliberative Process (DP)

The Carbon Limits study also states that "leak emissions at the facilities in the (Carbon Limits) database are lower than typical of US facilities, since the facilities in the database were subject to ongoing LDAR surveys. Therefore, we (Carbon Limits) consider the abatement costs presented in this report to be an overestimate of the real abatement cost for reducing emissions from US facilities, relative to the current (no-LDAR) baseline."

Ex. 5 Deliberative Process (DP)

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Low Production Sites:

EDF further asserts that "EPA's own compliance reports contain information on

exponentially greater numbers of low producing sites, and would allow for an assessment of the complexity of the sites and their associated emissions."

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Karen

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